

MAR 24 2016

JULIA A. DUDLEY, CLERK
BY: *[Signature]*
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION
MARCH 2016 SESSION

UNITED STATES OF AMERICA)

Case No. 7:16-CR-00017

v.)

**SUPERSEDING
INDICTMENT**

JOSHUA VORESS)

In violation of:

TYLER JOHNSON)

21 U.S.C. § 846

a/k/a "DJ")

21 U.S.C. § 841(a)(2)

NOEL PHILLIP SOLETT)

18 U.S.C. § 924(c)

a/k/a "Miami")

18 U.S.C. § 922(g)(1)

BRANDON SCOTT THOMAS)

18 U.S.C. § 1591(a)

a/k/a "Gambino")

COUNT ONE

The Grand Jury charges:

1. Beginning on a date unknown, but at least sometime in November 2015 and continuing thereafter through February 2016, in the Western District of Virginia, JOSHUA VORESS, TYLER JOHNSON, a/k/a "DJ," NOEL PHILLIP SOLETT, a/k/a "Miami," and BRANDON SCOTT THOMAS, a/k/a "Gambino", did knowingly and intentionally combine, conspire, confederate, and agree with other persons, both indicted and unindicted, to knowingly and intentionally distribute, and possess with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

2. All in violation of Title 21, United States Code, Section 846.

COUNT TWO

The Grand Jury charges:

1. On or about February 17, 2016, in the Western District of Virginia, NOEL PHILLIP SOLETT, a/k/a "Miami," knowingly and intentionally possessed with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance and a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(2) and (b)(1)(C).

COUNT THREE

The Grand Jury charges:

1. On or about February 17, 2016, in the Western District of Virginia, NOEL PHILLIP SOLETT, a/k/a "Miami," knowingly possessed in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, a firearm, that is a Taurus .45 caliber pistol, Serial Number NAT59933, as set forth in Count Two of this indictment.

2. All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FOUR

The Grand Jury charges:

1. On or about February 17, 2016, in the Western District of Virginia, NOEL PHILLIP SOLETT, a/k/a "Miami," knowingly and intentionally possessed a firearm, to wit a Taurus .45 caliber pistol, Serial Number NAT59933, and assorted ammunition, in or affecting interstate or

foreign commerce, after having been convicted of a crime punishable by imprisonment for a term exceeding one year.

2. All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

The Grand Jury charges:

1. On or about February 19, 2016, in the Western District of Virginia, TYLER JOHNSON, a/k/a "DJ," knowingly and intentionally possessed with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

1. All in violation of Title 21, United States Code, Section 841(a)(2) and (b)(1)(C).

COUNT SIX

The Grand Jury charges that:

1. On a date not known to the grand jury, but in or around July 2015 through in or around February 2016, in the Western District of Virginia, BRANDON SCOTT THOMAS, a/k/a/ "GAMBINO," the defendant, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, V1, knowing or in reckless disregard of the fact that force, threats of force, fraud, or coercion as described in Title 18, United States Code, Section 1591(e)(2), or any combination of such means, would be used to cause V1 to engage in a commercial sex act.

2. All in violation of Title 18, United States Code, Section 1591(a).

NOTICE OF FORFEITURE

1. Upon conviction of one or more of the felony offenses alleged in this indictment, the defendant(s) shall forfeit to the United States:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly as a result of the said offenses pursuant to Title 21, United States Code, Section 853(a)(1).
- b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said offenses, pursuant to Title 21, United States Code Section 853(a)(3).
- c. any firearm used or intended to be used to facilitate the transportation, sale receipt, possession, or concealment of controlled substances and/or raw materials, as described in Title 21, United States Code, Sections 881(a)(1) and (2), and any proceeds traceable to such property, pursuant to Title 21, United States Code, Section 881(a)(11) and Title 28, United States Code, Section 2461(c).
- d. any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to Title 18 United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited to the United States includes but is not limited to the following property:

a. Firearms and Ammunition

- (1) Taurus .45 caliber pistol, Serial Number NAT59933
- (2) Miscellaneous ammunition

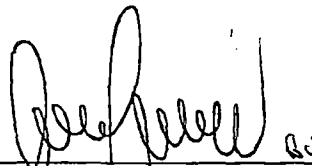
3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to Title 21, United States Code, Section 853(p), including but not limited to the property described above.

A TRUE BILL, this 24 day of March 2016.

s/ Grand Jury Foreperson
FOREPERSON



JOHN P. FISHWICK, JR.
UNITED STATES ATTORNEY